

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS**

KELLY THOMAS

Plaintiff,

v.

ZENITH SOLAR LLC

Defendant.

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)
) **Case No.:**
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) **7:22-cv-00047**
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PLAINTIFF'S REQUEST FOR AN ENTRY OF DEFAULT

TO THE CLERK OF COURT:

Plaintiff, Kelly Thomas ("Plaintiff"), by and through her undersigned counsel, hereby requests for entry of default against Defendant, Zenith Solar LLC ("Defendant").

Defendant, Zenith Solar LLC, was served via personal service on March 08, 2022. See Docket Entry 4. Accordingly, Defendant's answer would have been due April 07, 2022. As of this date, no answer has been filed by Defendant.

For those reasons and those set forth in the accompanying Affidavit, Plaintiff requests the Clerk enter default against Defendant pursuant to Fed. R. Civ. P. 55(a).

RESPECTFULLY SUBMITTED,

DATED: 06/02/2022

KIMMEL & SILVERMAN, P.C.

By: s/ Jacob U. Ginsburg, Esq.
Jacob U. Ginsburg, Esq.
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Attorney for the Plaintiff

CERTIFICATE OF SERVICE

I certify that on June 02, 2022, a copy of the foregoing has been served on all counsel of record via ECF and will also be sent to the Defendant Zenith Solar LLC by depositing a copy of same in the United States mail, postage prepaid, addressed as follows:

Zenith Solar LLC
13108 State Highway 191,
Midland, TX 79707

/s/ Jacob U. Ginsburg
Jacob U. Ginsburg